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INTERNATIONAL TELCOM LTD.

417 SECOND AVENUE WEST SEATTLE, WASHINGTON, USA

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SEP 18 2002

FCC - MAILROOM

September 17, 2002

Petition for Reconsideration
 FCC, Office of the Secretary
 445 12th St. SW
 Washington DC 20554

FCC Docket Nos. 97-21 and 96-45
 Filer 499 ID# 811580

In the matter of Request for Review by International Telcom, Ltd. of the Decision of the FCC dated August 21, 2002.

We are petitioning for reconsideration based on the following data:

1. We are a small telecommunications company with limited resources.
2. The persons who filed the original Form 499A, the revised Form 499A and the letter of appeal were inexperienced and are no longer employed by International Telcom, Ltd.
3. International Telcom, Ltd. has already paid approximately \$300,000 more in fees than we should have, had the revised Form 499A been accepted by USAC. Paying an additional \$46,126.25 would prove a hardship for the company. We will provide financial statements to substantiate the hardship provided you will not disseminate the information since we are a small private company.
4. We are currently making every effort to resolve this matter in a timely manner.

This is not a situation where International Telcom, Ltd. failed to pay money but rather where International Telcom, Ltd. overpaid in excess of \$300,000.00 and now are facing having to overpay an additional amount. The FCC has had the use of our money for over two years. We are not requesting interest, all we are requesting is a refund of money that we accidentally paid and which was never due to the FCC. The loss of this money and the possibility of having to pay additional fees would prove an undue hardship on the company especially in the current economic climate and telecommunications industry.

Sincerely,


 Yvette Melendez
 Secretary

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